

UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In re: Richard Burton Paul Monroe

Case No. 22-41504
Chapter 13

Debtor.

DEBTORS RESPONSE TO THE TRUSTEE'S MOTION TO DISMISS CHAPTER 13 PLAN

Debtor, comes now, through his undersigned counsel, for his response to the Chapter 13 Trustee's Motion to Dismiss his pending Chapter 13 filing, states the following:

1. Debtor is not intentionally failing to make his trustee payments.
2. Debtor expects to be able to begin trustee payments beginning in September, 2023 after a modified plan is filed or to file a conversion to a Ch 7.
3. Dismissal of the case would be to the detriment of the creditors as the debtor is attempting to make a good faith effort to pay back his debt.
4. Debtor would like to propose the following:
 - a. Debtor requests the Court grant a continuance of the pending Motion to Dismiss hearing, so he may file a modified plan and amend schedules I & J or a conversion to Ch 7.

WHEREFORE, the debtor requests that the Court grant the following relief:

1. Enter an order consistent with the above proposal; and
2. For other relief the Court believes is just and appropriate.

Dated: August 23, 2023

LIFEBACK LAW FIRM, P.A.

/e/ JESSE A. HOROSHA #0387797
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